



January 19, 2016

Mike Judge
Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114

Re: Impacts of Small Generation and Termination of SREC II

Dear Mr. Judge:

Compliance with the interconnection tariff process is both costly in time and money and it does not seem reasonable to expend hundreds of thousands of dollars to maintain a valid Interconnect Service Agreement and have a projects viability thrown into question over a yet-to-be determined new program. Projects with a valid ISA should have a ninety-day cure time to secure the balance of remaining non-ministerial permits and compliance documentation. The above is based upon observance of what happened at the end of the SREC I program and the uncertainty of the availability of the 250 MW of SREC II program capacity greater than 25 kW that existed as of January 5, 2016, the date of the Small Generation Cap announcement. If the SREC II cap remains open after April 5, 2016 this request would not apply and DOER should default to the comments below:

- 1) Treat all completed applications (fully permitted with all non-ministerial permits, executed ISA, site control) as a priority above any incomplete applications that are deficient or have been submitted prior to a complete application;
- 2) Consider any application with a signed and executed ISA as a priority over any project without an executed ISA, in the queue;
- 3) Establish a clear time period for reviewing a project to determine if it is complete or deficient before removing it from the queue, allowing enough time to remedy minor deficiencies;
- 4) Establish a new solar incentive program with a reasonable comment period to take in stakeholder concerns such that there is not a long time gap between the end of the 1600 MW program and the new incentive program, thereby unnecessarily delaying projects and investments in the local solar industry.
- 5) Maintain low income, community shared, and municipal solar projects as priority categories in any new incentive program.
- 6) Add a new category of community-shared solar called Commercial Community-Shared Solar to allow all businesses less than 300 kW to participate in the Massachusetts solar program. These small to medium size Massachusetts businesses may be too small to be considered as credit worthy off-takers for financing purposes but could take the position as one of many as a community solar off-taker.

Thank you for your consideration.



Best Regards,

A handwritten signature in black ink, appearing to read "Doug Pope", with a long, sweeping horizontal stroke extending to the right.

Doug Pope
President